

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

TESSA KNOX

Plaintiff,

v.

JOHN VARVATOS ENTERPRISES, INC.
Defendant.

Civil Action No. 1:17-cv-00772
(GWG)

**DECLARATION OF
JON DEL GAIZO**

Pursuant to 28 U.S.C. § 1746, I, Jon Del Gaizo, hereby declare as follows:

1. I am the Senior Manager of Payroll & Benefits at Defendant John Varvatos Enterprises, Inc. (“Varvatos”). The facts set forth in this Declaration are based on my personal knowledge except as otherwise set forth herein. If called and sworn as a witness, I could and would testify competently to the matters set forth herein.

2. I have access to and am familiar with Varvatos’s personnel and payroll records systems, which are kept in the ordinary course of Varvatos’s business. I used data from those systems to determine the number of female sales associates and sales professionals that Varvatos employed during certain periods and within certain geographic boundaries.

3. From February 1, 2011, to January 18, 2016, Varvatos employed 20 female sales associates/professionals in the State of New York.

4. From January 19, 2016, through today, Varvatos has employed 18 female sales associates/professionals in the State of New York.

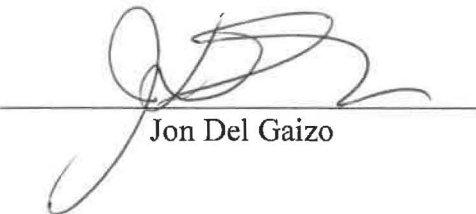
5. From February 1, 2014, through today, Varvatos has employed 24 female sales associates/professionals in the State of New York.

6. From April 16, 2016, through today, Varvatos has employed 54 female sales associates/professionals in the United States.

7. From August 14, 2016, through today, Varvatos has employed 48 female sales associates/professionals in the United States.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 1, 2017.



Jon Del Gaizo